



CULLEN and DYKMAN LLP

---

177 Montague Street  
Brooklyn, New York 11201-3602  
Telephone (718) 855-9000 • Facsimile (718) 935-1509

**KEVIN M. WALSH**

PARTNER

DIRECT DIAL: 718-780-0159

DIRECT FAX: 718-935-1509

KWALSH@CULLENANDDYKMAN.COM

October 26, 2012

Via ECF Only

The Honorable Magistrate Judge  
Gary R. Brown  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 1007

**Re: Peter Dickman v. Verizon Communications Inc., D/B/A  
Verizon Wireless  
Eastern District of New York US District Court CV-10-2595  
Our File # : 10876-334**

---

Dear Honorable Judge Brown:

This letter is in support of the request by the attorney for the plaintiff to extend the time to file a stipulation of discontinuance. This will also serve to correct the facts as set forth in the letter from the plaintiff.

In view of the fact that this settlement involves Verizon notifying credit agencies in order to delete the plaintiff's trade line people from Verizon must review the proposed language in the settlement agreement.

I requested ten days for the client to review the language since there may be several people at Verizon who need to review this. Thus far I have had three days.

Once the client has reviewed the language the attorney for the plaintiff must review our proposed changes and the attorneys must agree on the language in the settlement agreement.

I am simply requesting a reasonable amount of time to 1) have the client review the proposed settlement agreement, 2) have the attorney for the plaintiff review any proposed changes and 3) come to an agreement on the proposed language in the settlement agreement.

The case was resolved on October 10, 2012. The attorney for the plaintiff fails to inform the court that he did not forward his proposed settlement agreement until October 15, 2012.

Upon receipt of the proposed settlement agreement I immediately called the attorney for the plaintiff to request a change before I sent it to my client. I had to call the attorney a second time as the attorney failed to return my call for over a week. The attorney finally called on October 22, 2012, apologized and said "he was busy." On October 22, 2012 at 6:28 pm I finally received the revised settlement agreement. On October 23, 2012 I forwarded the settlement agreement for review.

I consent to the November 17, 2012 proposed date. However, the record should be clear that any delay has not been the fault of the defendant. Verizon merely seeks a reasonable time to review the documents and distribute the funds.

Thank you for your consideration.

Very truly yours,  
*Kevin M. Walsh*  
Kevin M. Walsh

KMW:ec

Cc: Via Email  
Amar Goldstein  
Wendy Tobias